IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

FEI GUAN, :

Plaintiff,

Case No. 1:17cv00332

(JCC/IDD)

v.

:

BING RAN, et al,

Defendants, :

DEFENDANT ALICE GUAN'S MOTION TO DISMISS AMENDED COMPLAINT

COMES NOW defendant ALICE GUAN, by Counsel and moves this Court to dismiss the Amended Complaint in this matter for failure to state a claim pursuant to Rule 12 (b) (6) of the Federal Rules of Civil Procedure.

All allegations against Alice Guan are for actions as an agent of the corporate defendant Advanced Systems Management and Technology, Inc.

A memorandum in support of this motion to dismiss is filed separately in this case.

Respectfully Submitted,

ALICE GUAN, By Counsel

/s/

Tate Bywater Fuller Mickelsen & Tull, PLC

Counsel for Defendant Alice Guan

Douglas E. Bywater
James R. Tate
Paul Mickelsen
Bar No 9137
Bar No 6241
Bar No 71274
Travis D. Tull
Bar No 47486

2740 Chain Bridge Road

Vienna, VA 22181

703-938-5100 Tel

703-255-1097 Fax

debywater@tatebywater.com jtate@tatebywater.com pmickelsen@tatebywater.com ttull@tatebywater.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on the 23rd day of May, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing (NEF) to at least the following counsel of record:

Joshua Erlich, Esquire
Davia Craumer, Esquire
Katherine Herrmann, Esquire
THE ERLICH LAW OFFICE, PLLC
2111 Wilson Boulevard, Suite 700
Arlington, VA 22201
jerlich@erlichlawoffice.com
dcraumer@erlichlawoffice.com
kherrmann@erlichlawoffice.com
Counsel for Plaintiff Fei Guan

James B. Kinsel, Esquire
Rebecca Bricken Segal, Esquire
PROTORAE LAW, PLLC
1921 Gallows Toad, Suite 950
Tysons, VA 22182
jkinsel@protoraelaw.com
rsegal@protoraelaw.com
Counsel for Defendant Advanced System
Technology and Management, Inc.

Robert R. Vieth, Esquire
Mihir V. Elchuri, Esquire
HIRSCHLER FLEISCHER, P.C.
8270 Greensboro Drive, Suite 700
Tysons, VA 22102
rvieth@hf-law.com
melchuri@hf-law.com
Counsel for Defendant Qi Tech, LLC

William B. Cummings, Esquire WILLIAM B. CUMMINGS, P.C. Post Office Box 1177 Alexandria, VA 22313 wbcpclaw@aol.com Counsel for Defendant Bing Ran